

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

BAYOU STEEL BD HOLDINGS, L.L.C., *et al.*,¹

Debtors.

GEORGE L. MILLER, in his capacity as
Chapter 7 Trustee for the jointly administered
bankruptcy estates of Bayou Steel BD
Holdings, L.L.C., *et al.*,

Plaintiff,

v.

BLACK DIAMOND CAPITAL
MANAGEMENT, L.L.C., *et al.*,

Defendants.

Chapter 7

Case No. 19-12153 (KBO)

(Jointly Administered)

Adv. No. 21-51013 (KBO)

Hearing Date: May 25, 2022 at 11:00 a.m. (ET)
Ref. Adv. Docket Nos. 25, 27

NOTICE OF ORAL ARGUMENT ON DEFENDANTS' MOTIONS TO DISMISS

PLEASE TAKE NOTICE that a hearing with respect to oral argument on the: (i) *Independent Directors Motion to Dismiss* (Adv. Docket No. 25); and (ii) *Defendants Black Diamond Capital Management, L.L.C., BDCM Opportunity Fund IV, L.P., Black Diamond Commercial Finance, L.L.C, Sam Farahnak, and Phil Raygorodetsky's Motion to Dismiss* (Adv. Docket No. 27) will be held on **May 25, 2022, at 11:00 a.m. (Prevailing Eastern Time)** before the Honorable Karen B. Owens, United States Bankruptcy Court Judge, at the United States Bankruptcy Court for the District of Delaware, 824 North Market Street, 6th Floor, Courtroom #3, Wilmington, DE 19801.

¹ The Debtors in these chapter 7 cases, along with the last four digits of each Debtor's federal tax identification number, are: Bayou Steel BD Holdings, L.L.C. (1984), BD Bayou Steel Investment, LLC (1222), and BD LaPlace, LLC (5783).

Dated: March 28, 2022

PACHULSKI STANG ZIEHL & JONES LLP

/s/ Colin R. Robinson

Bradford J. Sandler (DE Bar No. 4142)
Colin R. Robinson (DE Bar No. 5524)
Peter J. Keane (DE Bar No. 5503)
919 North Market Street, 17th Floor, P.O. Box 8705
Wilmington, DE 19899 (Courier 19801)
Tel: (302) 652-4100
Fax: (302) 652 -4400
E-mail: bsandler@pszjlaw.com
crobinson@pszjlaw.com
pkeane@pszjlaw.com

and

KAUFMAN, COREN & RESS, P.C.

Steven M. Coren, Esq.
Benjamin M. Mather, Esq.
Janice D. Felix, Esq.
Two Commerce Square
2001 Market Street, Suite 3900
Philadelphia, PA 19103
Tel: (215) 735-8700
Fax: (215) 735-5170
E-mail: scoren@kcr-law.com
bmather@kcr-law.com
jfelix@kcr-law.com

Counsel for George L. Miller, Chapter 7 Trustee